

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                     |   |   |
|---------------------|---|---|
| TIMOTHY D. KANE,    | ) |   |
|                     | ) |   |
| Plaintiff,          | ) |   |
|                     | ) |   |
| v.                  | ) | Case No. 07 C 6590                      |
|                     | ) |   |
| RAYMOND GILBERT and | ) | Magistrate Judge Maria Valdez (consent) |
| JOSEPH PAAVILAINEN, | ) |   |
|                     | ) |   |
| Defendants.         | ) |   |

**MOTION FOR LEAVE TO TAKE DEPOSITION**

RAYMOND GILBERT and JOSEPH PAAVILAINEN, defendants, by their attorney, Daniel P. Field, respectfully move, pursuant to Fed.R.Civ.P 30(a)(2)(B), for leave to take the deposition of the plaintiff, and in support thereof, states as follows:

1. The plaintiff, Timothy D. Kane, is currently in the custody of the Illinois Department of Corrections at Menard Correctional Center in Chester, Illinois.
2. Fed.R.Civ.P. 30(a)(2)(B) requires leave of court to depose a deponent who is confined in prison.
3. These defendants request leave to take the deposition of the plaintiff regarding the allegations of his complaint and claimed damages.

WHEREFORE, RAYMOND GILBERT and JOSEPH PAAVILAINEN, defendants, pray that this court enter its order granting them leave to take the deposition of plaintiff, Timothy D. Kane, a prisoner.

Respectfully submitted,

RAYMOND GILBERT and JOSEPH  
PAAVILAINEN, Defendants

By: s/Daniel P. Field

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